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Member of NJ & NY Bars

June 19, 2020

VIA ECF

Hon. Andrew L. Carter, Jr.
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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RE: USA vs Jose Hernandez, **Christopher Lawrence** *et al.*
Indictment 18-cr-420

Dear Judge Carter:

I represent Christopher Lawrence (Lawrence) in the above referenced indictment. I am respectfully requesting that Your Honor schedule an emergent bail hearing for Mr. Lawrence. He is seeking 8-hour temporary bail on Monday, June 22, 2020 in order to attend the funeral services of his mother, Verlethea Maynard who passed away last night.

Procedural History

Lawrence pleaded guilty to a narcotics offense and 18 U.S.C. § 924(c)(1)(A)(i). His sentence is pending. His stipulated sentencing range is 130-147 months. His sentencing memorandum requests a downward variance to a 72-month sentence.

Your Honor denied Lawrence's appeal of the denial of his bail motion made in Magistrate Court.

Lawrence's Background

Lawrence is a 36-year-old lifelong resident of New York. He has 5 children ranging from 7 years old to 19 years old. He has a 10th grade education. He is engaged to Mary Wins, the mother of his 7-year-old daughter. He has neither a passport nor a driver's license. He has a very close-knit family; both his sister and his adoptive mother live in New York City.

Lawrence does have a criminal record; however, it is far from extensive and does not include any crimes of violence. He has 2 felony convictions. On July 28, 2015 and on August 19, 2015 he was arrested by the NYPD for criminal sale of a controlled substance in the 3rd degree. On February 2, 2016 he was sentenced on the two 2 separate drug charges to a concurrent 1 year sentence, commonly known as a "City Year".

Lawrence has no history of substance abuse or participation in substance abuse programs. He is in relatively good health, aside from suffering from deep vein thrombosis, a blood clot in his leg which required him to be on drug thinners and curtail extreme physical activity.

He has used his time in custody for self-improvement, in fact, he requested two lengthy postponements of his sentence first, to complete his GED and second, to complete the Focus Forward Program.

Proposed Conditions of Release

Lawrence submits that if the Court releases Lawrence in with the following conditions then Lawrence would pose neither a risk of flight nor a danger to the community:

- His release shall be for no more than 8 hours;
- Travel shall be restricted to the Weldon Funeral Home, 343 E. 116th Street, New York, NY;
- He shall be prohibited from consuming alcohol or using drugs;
- He shall be transported from and to the Metropolitan Corrections Center by his fiancé, Mary Wins

Lawrence has enormous incentive to abide by any conditions of temporary release the Court may deem appropriate. The consequences of Lawrence violating temporary release conditions (increased sentence and new criminal charges) militate in favor of him being granted temporary release to attend his mother's funeral.

Alternative Request

In the event Your Honor denies Lawrence temporary bail it is respectfully requested that Your Honor execute an order directing that MCC allow Lawrence to attend the funeral services by way of video conferencing technology such as Skype.

Respectfully submitted,

/s/Thomas Ambrosio
Thomas Ambrosio

cc: All counsel of record (via ECF)

The temporary bail application is DENIED.
The parties shall file a joint status report on 6/25/20
regarding the feasibility of attending the funeral via Skype or
another videoconferencing platform from the jail.
So Ordered.


6/23/20